

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-00193

**VEASEY-LULAC PLAINTIFFS' PRELIMINARY RESPONSE TO
DEFENDANTS' ADVISORY OF JULY 22, 2014**

The Veasey-LULAC Plaintiffs submit this preliminary response to the Advisory filed by Defendants on July 22, 2014, regarding the DPS data extract that Defendants provided to the United States in January 2014. That extract, in turn, has been relied upon by all parties (and some of their experts) to conduct matching between the TEAM voter registration database and the various ID databases, including the DPS database. Defendants' assertion that the data provided six months ago were incomplete is of very serious concern.

The Veasey-LULAC Plaintiffs respectfully request that the Court address the issues raised by Defendants' Advisory at the hearing scheduled for Thursday, July 24, 2014. Plaintiffs further request that the Court notify Defendants today to be prepared to address these issues at tomorrow's hearing.

These are only preliminary suggestions of the Veasey-LULAC Plaintiffs and may be supplemented later today.

Respectfully submitted,

/s/ Chad W. Dunn

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2014, I served a true and correct copy of the foregoing document via the Court's ECF system to all counsel of record.

/s/ Chad W. Dunn
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